

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ENCOMPASS HEALTHCARE, PLLC,

Plaintiff,

v.

Case No.

Hon.

Mag. Judge

ALLSTATE INSURANCE COMPANY,

Defendant.

ADAM J. DEVLIN (P72877)
DEVLIN LAW, PLLC
Attorney for Plaintiff
30850 Telegraph Road, Suite 250
Bingham Farms, MI 48025
Phone: (248) 703-6201
Fax: (248) 987-0490
ajd@devlinlawpllc.com

C. DAVID MILLER II (P38449)
THAMARA E. SORDO-VIEIRA
(P81870)
GARAN LUCOW MILLER, P.C.
Attorneys for Defendant
1155 Brewery Park Blvd., Suite 200
Detroit, MI 48207-2641
Phone: (313) 446-5561
Fax: (313) 259-0450
cmiller@garanlucow.com
tsordo@garanlucow.com

**NOTICE OF REMOVAL OF CAUSE
TO UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION**

To: ADAM J. DEVLIN (P72877)

1. On July 14, 2022, Plaintiff commenced this cause of action in the Circuit Court for the County of Oakland, State of Michigan, by filing a

Summons and Complaint in which Allstate Insurance Company is a named Defendant.

2. Plaintiff has alleged this cause of action to have arisen out of an event(s) which occurred on and after May 20, 1994, in the County of Wayne, State of Michigan.

3. That this action is a suit at common law of a civil nature and the amount involved, exclusive of interest and costs, upon information and belief, based upon the allegations regarding injuries sustained by Plaintiff in its Complaint. Upon good faith, Defendant believes Plaintiff will be seeking damages in excess of \$75,000.00. Plaintiff has submitted a request for reimbursement for services in excess of \$100,000.00.

4. Plaintiff claims No-Fault benefits are due and owing, according to the Complaint, from July 14, 2021 to present.

5. Defendant Allstate Insurance Company shows this Honorable Court that this action involves a controversy between citizens of different states, in that:

(A) Plaintiff is a resident of the State of Michigan by virtue of incorporating in the State of Michigan. (**Exhibit 1 – Plaintiff’s Complaint.**)

(B) Defendant, Allstate Insurance Company, is a resident of the State of Illinois by virtue of being incorporated under the laws of the State of Illinois and having its principal place of business in Illinois. Defendant is not a citizen of the State of Michigan (**Exhibit 1, paragraph 2**).

6. This Notice of Removal is hereby filed with this Court, within thirty (30) days after receipt by Defendant of a copy of the initial pleading setting forth a claim for relief upon which this action is based, as required by 28 U.S.C. §1446(b), a copy of that pleading having been received by Defendant on July 19, 2022. (**Exhibit 2 – Summons and Service of Process transmittal summary**).

7. Written notice of filing this removal has been given to all adverse parties as required by law and a copy of the Notice of Removal has been filed with the Clerk of the Court for the County of Oakland, State of Michigan.

8. Attached is a copy of all process and pleadings served upon Defendant Allstate in this case. (**Exhibit 1 - copy of Complaint with Summons.**)

WHEREFORE, Defendant herein, respectfully requests that this Honorable Court enter its Order for removing this cause from the Circuit

Court for the County of Oakland, State of Michigan, to the United States
District Court, Eastern District of Michigan, Southern Division.

Respectfully submitted:

GARAN LUCOW MILLER, P.C.

/s/C. David Miller II

C. DAVID MILLER II (P38449)

Attorney for Defendant

1155 Brewery Park Blvd.

Suite 200

Detroit, MI 48207-2641

(313) 446-5561

cmiller@garanlucow.com

Dated: August 16, 2022

5384974.1

EXHIBIT 1

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE 6th	SUMMONS	CASE NO. 2022-195093-CZ
---	---------	----------------------------

Court address

1200 N Telegraph Rd Pontiac, MI 48341

Court telephone no.

Plaintiff's name(s), address(es), and telephone no(s).
Encompass Holdings LLCDefendant's name(s), address(es), and telephone no(s).
Allstate Insurance Company

v

 Plaintiff's attorney, bar no., address, and telephone no.
 Adam J Devlin P72877
 30850 Telegraph Rd
 Ste 250
 Bingham Farms, MI 48025
 248 703 6201

 This case has been designated as an
 eFiling case, for more information
 please visit www.oakgov.com/efiling.

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

 been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

 The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 7/18/2022	Expiration date* 10/17/2022	Court clerk Lisa Brown
-------------------------	--------------------------------	---------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

SUMMONS
Case No. 2022-195093-CZ

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

☐ I served personally a copy of the summons and complaint.

☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with

List all documents served with the summons and complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____, _____ County, Michigan.
Date

My commission expires: _____ Date Signature: _____
Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____
Attachments

_____ on _____
Day, date, time

Signature _____ on behalf of _____

This case has been designated as an eFiling case, for more information please visit
www.oakgov.com/efiling.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

ENCOMPASS HEALTHCARE, PLLC

Plaintiffs,

2022-195093-CZ
Case No: -CZ.

Vs.

Hon. JUDGE KWAME' L. ROWE

ALLSTATE INSURANCE COMPANY

Defendant.

ADAM J DEVLIN, P72877
DEVLIN LAW, PLLC
Attorney for Plaintiff
30850 Telegraph Rd Ste 250
Bingham Farms, MI 48025
248 703 6201 / 248 987 0490 fax
ajd@devlinlawpllc.com

_____ /

COMPLAINT

There are no other pending or resolved civil actions
arising out of the transactions or occurrences alleged in
this complaint. - /s/ Adam J Devlin P72877

NOW COMES Plaintiff, ENCOMPASS HEALTHCARE, PLLC, by and through its
attorneys Devlin Law, PLLC, and for its complaint states as follows:

1. Plaintiff, Encompass Healthcare, PLLC. is a Domestic Professional Limited Liability
Company located in West Bloomfield, Michigan.
2. Defendant, ALLSTATE INSURANCE COMPANY, is a foreign corporation
authorized to conduct business in the State of Michigan as well as authorized to

transact business as an insurance company, which conducts regular systematic business in Oakland County, Michigan

3. Patient, William Vasil is insured by Defendant, Claim Number, 0576660336 (“Patient”)
4. The amount in controversy is within the jurisdiction of this Court and this case involves a claim for damages in excess of Twenty-Five Thousand (\$25,000.00) Dollars, exclusive of costs, interest and attorney fees.

General Allegations

5. Plaintiff re-alleges and incorporates all preceding paragraphs as if set forth fully herein.
6. On or about May 20, 1994, Patient was involved in a motor vehicle accident, suffering a serious impairment of a bodily function and/or permanent serious disfigurement.
7. Defendant provides medical insurance benefits to Patient for treatment of injuries or infectious disease arising out of that automobile accident.
8. Patient was treated by Plaintiff from starting November 2, 2015.
9. At all times relevant to this complaint, Patient was insured by Defendant under a policy authorized and approved by the Insurance Commissioner of the State of Michigan for sale by Defendant to the citizens of the State of Michigan in compliance with the Michigan No-Fault Insurance Act.
10. The medical care giving rise to this cause of action was performed and provided by Plaintiff on behalf of Patient.

11. The Michigan No-Fault Insurance Act requires insurers to make timely payment of all usual and/or reasonable and/or customary charges incurred for reasonably necessary products, services and accommodations within thirty days following receipt of “reasonable proof of the fact and amount” of the incurred expense.
12. Plaintiff is entitled to be reimbursed for reasonable and necessary treatment and charges pursuant to the Michigan No-Fault Insurance Act.

Count I – Breach of Contract

13. Plaintiff re-alleges and incorporates all preceding paragraphs as if set forth fully herein.
14. As a result of the injuries sustained by Patient in the motor vehicle accident, Patient required the services provided by Plaintiff, which are payable under the terms of the insured Patient’s contract of insurance purchased from Defendant.
15. Plaintiff provided reasonably necessary goods and services to Patient, for whom Defendant is the No-Fault insurer and is therefore obligated to pay all usual and/or reasonable and/or customary charges for reasonably necessary goods and services within 30 days of presentation of reasonable proof of the fact that the goods or services were provided and the amount of the incurred expense.
16. Defendant has been billed for usual and/or reasonable and/or customary charges for reasonable and necessary services provided by Plaintiff and has wrongfully refused to pay benefits in accordance with the applicable No-Fault and contract provisions.
17. Reasonable proof required for full payment has been supplied to Defendant for all services provided to Patient.

18. Defendant has refused to pay the reasonable and necessary charges for the services provided.
19. Defendant is in breach of contract and breach of its statutory duties to make payments for the medical expenses provided by Plaintiff.
20. As of the filing of this complaint, there remains an unpaid balance for medications, goods and services rendered to Patient by Plaintiff plus interest and attorneys' fees.
21. As a result of the aforesaid accident, the Plaintiff has incurred medical expenses regarding the care, recovery and rehabilitation of Patient.
22. Defendant is responsible for paying the medical expenses incurred by Plaintiff relative to the treatment of Patient as a result of the accident.
23. Defendant is in breach of contract and breach of statutory duties to make payments of the medical expenses incurred by Plaintiff.
24. As of the filing of this complaint, there remains an unpaid balance for goods and services rendered to Patient in excess of twenty-five thousand (\$25,000.00) dollars exclusive of costs, interest and attorney fees.

WHEREFORE, Plaintiff requests a declaration of rights and a judgment for damages not less than \$25,000.00 for unpaid no-fault benefits which have accrued through the date of judgment, plus costs, statutory interest and attorney fees.

Count II – Declaratory Relief

25. Plaintiff re-alleges and incorporates all preceding paragraphs as if set forth fully herein.
26. Pursuant to MCR 2.605, the Court has the authority to declare the rights and obligations of Plaintiff and Defendant relative to the Plaintiff's treatment of the Patient.
27. A declaration of rights between the parties is needed to determine:

28. The applicability of the Michigan No-Fault Insurance Act of the claims of the Plaintiff;
29. The amount of medical expenses, no-fault interest, actual attorney fees and other benefits owed to Plaintiff;
30. Such other determinations, orders or judgment as are necessary to fully adjudicate the rights of the parties; and
31. Whether and in what amount, any reductions, setoffs or reimbursements may be claimed by the Defendant.

WHEREFORE, Plaintiff requests a declaration of rights and a judgment for damages not less than \$25,000.00 for unpaid no-fault benefits which have accrued through the date of judgment, plus costs, statutory interest and attorney fees.

Respectfully submitted,

/s/ Adam J Devlin

Dated: 7/14/2022

EXHIBIT 2



CT Corporation
Service of Process Notification
07/22/2022
CT Log Number 541971826

Service of Process Transmittal Summary

TO: Debbie Byrnes
ALLSTATE INSURANCE COMPANY
27555 EXECUTIVE DR STE 225, METRO DETROIT AUTO
FARMINGTON HILLS, MI 48331-3589

RE: Process Served in Michigan

FOR: Allstate Insurance Company (Domestic State: IL)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: ENCOMPASS HEALTHCARE, PLLC vs. Allstate Insurance Company

DOCUMENT(S) SERVED: Summons, Proof, Complaint

COURT/AGENCY: 6th Circuit Court - Oakland County, MI
Case # 2022195093CZ

NATURE OF ACTION: Insurance Litigation

PROCESS SERVED ON: The Corporation Company, Plymouth, MI

DATE/METHOD OF SERVICE: By Traceable Mail on 07/22/2022 postmarked on 07/19/2022

JURISDICTION SERVED: Michigan

APPEARANCE OR ANSWER DUE: Within 28 days (Document(s) may contain additional answer dates)

ATTORNEY(S)/SENDER(S): Adam J Devlin
DEVLIN LAW, PLLC
30850 Telegraph Rd Ste 250
Bingham Farms, MI 48025
248-703-6201

ACTION ITEMS: CT has retained the current log, Retain Date: 07/22/2022, Expected Purge Date: 07/27/2022

Image SOP

Email Notification, Debbie Byrnes debbie.byrnes@allstate.com

Email Notification, Lana Duell lana.duell@allstate.com

REGISTERED AGENT CONTACT: Larry Mitchell
40600 Ann Arbor Road E
Suite 201
Plymouth, MI 48170
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other



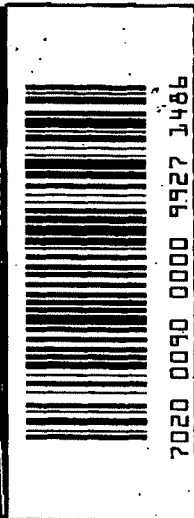
CT Corporation
Service of Process Notification

07/22/2022

CT Log Number 541971826

information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Devlin Lew
30850 Telegraph Rd
Ste 250
Bingham Farms, MI 48025



Resident Agent
re: Allstate Insurance Company
40600 Ann Arbor Rd East
Ste 201
Plymouth, MI 48170

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE 6th	SUMMONS	CASE NO. 2022-195093-CZ
---	----------------	-----------------------------------

Court address

1200 N Telegraph Rd Pontiac, MI 48341

Court telephone no.

 Plaintiff's name(s), address(es), and telephone no(s).
 Encompass Holdings LLC

 Defendant's name(s), address(es), and telephone no(s).
 Allstate Insurance Company

v

 Plaintiff's attorney, bar no., address, and telephone no.
 Adam J Devlin P72877
 30850 Telegraph Rd
 Ste 250
 Bingham Farms, MI 48025
 248 703 6201

 This case has been designated as an
 eFiling case, for more information
 please visit www.oakgov.com/efiling.

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

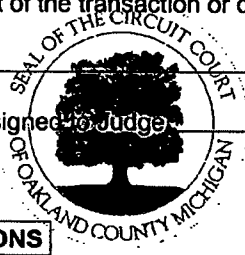
- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

 been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

 The action ☐ remains ☐ is no longer pending.


Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 7/18/2022	Expiration date* 10/17/2022	Court clerk Lisa Brown
-------------------------	--------------------------------	---------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

SUMMONS

Case No.2022-195093-CZ

PROOF OF SERVICE

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint.
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with

List all documents served with the summons and complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee
\$		\$
Incorrect address fee	Miles traveled	Fee
\$		\$
		TOTAL FEE
		\$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____, _____ County, Michigan.
 Date

My commission expires: _____ Signature: _____
 Date Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____
 Attachments

_____ on _____
 Day, date, time

Signature _____ on behalf of _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ENCOMPASS HEALTHCARE, PLLC,

Plaintiff,

v.

Case No.

Hon.

Mag. Judge

ALLSTATE INSURANCE COMPANY,

Defendant.

ADAM J. DEVLIN (P72877)
DEVLIN LAW, PLLC
Attorney for Plaintiff
30850 Telegraph Road, Suite 250
Bingham Farms, MI 48025
Phone: (248) 703-6201
Fax: (248) 987-0490
ajd@devlinlawpllc.com

C. DAVID MILLER II (P38449)
THAMARA E. SORDO-VIEIRA
(P81870)
GARAN LUCOW MILLER, P.C.
Attorneys for Defendant
1155 Brewery Park Blvd., Suite 200
Detroit, MI 48207-2641
Phone: (313) 446-5561
Fax: (313) 259-0450
cmiller@garanlucow.com
tsordo@garanlucow.com

AFFIDAVIT

STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE)

C. DAVID MILLER II, being first duly sworn, deposes and says, that he is associated with the law firm of GARAN LUCOW MILLER, P.C. and that he has been charged with the defense and representation of the defendant herein; that in such capacity he has prepared the foregoing Notice for

Removal of Cause to the United States District Court, Eastern District of Michigan, Southern Division, that the matters set forth in said Notice are true except as to those matters stated herein to be upon his information and belief as to which matters he is informed and believes same to be true.

Further deponent saith not.

/s/C. David Miller II

C. DAVID MILLER II (P38449)

Subscribed and sworn to before me
on this 16th day of August, 2022

/s/ Gail J. Musialowski

GAIL J. MUSIALOWSKI, Notary Public
County of Macomb, State of Michigan
My Commission Expires: 04/01/28
Acting in the County of Wayne

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ENCOMPASS HEALTHCARE, PLLC,

Plaintiff,

v.

Case No.

Hon.

Mag. Judge

ALLSTATE INSURANCE COMPANY,

Defendant.

ADAM J. DEVLIN (P72877)
DEVLIN LAW, PLLC
Attorney for Plaintiff
30850 Telegraph Road, Suite 250
Bingham Farms, MI 48025
Phone: (248) 703-6201
Fax: (248) 987-0490
ajd@devlinlawpllc.com

C. DAVID MILLER II (P38449)
THAMARA E. SORDO-VIEIRA
(P81870)
GARAN LUCOW MILLER, P.C.
Attorneys for Defendant
1155 Brewery Park Blvd., Suite 200
Detroit, MI 48207-2641
Phone: (313) 446-5561
Fax: (313) 259-0450
cmiller@garanlucow.com
tsordo@garanlucow.com

CERTIFICATE OF SERVICE

GAIL J. MUSIALOWSKI, being first duly sworn, deposes and says that she is associated with the law firm of GARAN LUCOW MILLER, P.C., attorneys for Defendant and that on August 16, 2022, she caused to be served a true copy of NOTICE FOR REMOVAL, AFFIDAVIT and PROOF OF SERVICE upon the following:

Adam J. Devlin, Esq.
DEVLIN LAW, PLLC
30850 Telegraph Road, Suite 250
Bingham Farms, MI 48025

Assignment Clerk
OAKLAND COUNTY
CIRCUIT COURT
1200 N. Telegraph Road
Dept. 404
Pontiac, MI 48341-0407

by electronically filing the foregoing paper with the Clerk of the Oakland County Circuit Court using the MiFILE system.

/s/ Gail J. Musialowski